# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

BENJAMIN CRAIG, Individually and on	Civil Action No. 3:17-cv-01005-RGJ-JPM
Behalf of All Others Similarly Situated,	GY A GG A GETYON
Plaintiff,	CLASS ACTION
vs.	
CENTURYLINK, INC., et al.,	
Defendants.	
DON J. SCOTT, Individually and on Behalf of All Others Similarly Situated,	Civil Action No. 3:17-cv-01033-RGJ-JPM
Plaintiff,	CLASS ACTION
vs.	) )
CENTURYLINK, INC., et al.,	
Defendants.	
	•

[Caption continued on following page.]

NOTICE OF MOTION AND MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL

AMARENDRA THUMMETI, Individually	) Civil Action No. 3:17-cv
and on Behalf of All Others Similarly Situated,	) (Transferred from S.D.N.Y. on August 16,
	) 2017, Case No. 1:17-cv-04695-PGG)
Plaintiff,	)
	) <u>CLASS ACTION</u>
vs.	)
CENTURYLINK, INC., et al.,	) )
Defendants.	) )
	)

#### TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (the "Investment Fund") will move this Court for an order: (1) consolidating the three related actions; (2) appointing the Investment Fund as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995; and (3) approving the Investment Fund's selection of Robbins Geller Rudman & Dowd LLP as lead counsel. In support of this Motion, the Investment Fund submits the accompanying memorandum of law and the declaration of Andrew Lemmon.

DATED: August 21, 2017 LEMMON LAW FIRM, LLC ANDREW A. LEMMON (#18302)

### s/ ANDREW A. LEMMON ANDREW A. LEMMON

15058 River Road Hahnville, LA 70057 Telephone: 985/783-6789 985/783-1333 (fax)

Local Counsel for Plaintiff

ROBBINS GELLER RUDMAN & DOWD LLP
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Telephone: 619/231-1058
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiff

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 21, 2017.

s/ ANDREW A. LEMMON ANDREW A. LEMMON

LEMMON LAW FIRM, LLC 15058 River Road Hahnville, LA 70057 Telephone: 985/783-6789 985/783-1333 (fax)

E-mail: andrew@lemmonlawfirm.com

### Mailing Information for a Case 3:17-cv-01005-RGJ-JPM Craig v. CenturyLink Inc et al

#### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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#### **Manual Notice List**

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## Mailing Information for a Case 3:17-cv-01033-RGJ-JPM Scott v. CenturyLink Inc et al

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